

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
JAMEO DEWAYNE POLLOCK	)	Case No. 17-35895-KRH
	)	Chapter 13
Debtor	)	

**MOTION TO INCUR DEBT**

COMES NOW, the Debtor, by counsel, and as and for Debtor's Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on November 28, 2017.
2. The Debtor has applied for and Basic Auto Sales RVA has approved a loan to the Debtor in the amount of \$27,140.89 plus interest at 16.75% per annum to be repaid with 72 equal monthly payments of \$600.00 for the purchase of a 2018 Dodge Durango SXT or similar vehicle.
3. The Debtor needs to purchase the vehicle because Debtor's current vehicle is having major mechanical issues and they need a replacement vehicle to conduct normal daily business.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate Debtor's ability to perform under the Chapter 13 Plan filed herein.
5. The Debtor's Chapter 13 Plan has been confirmed.

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

WHEREFORE, the Debtor request that the Court enter an Order approving the aforesaid loan on the terms stated herein, and for such other relief as the Court may deem appropriate.

JAMEO DEWAYNE POLLOCK

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane  
James E. Kane

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**NOTICE OF MOTION AND HEARING**

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
Kane & Papa, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing scheduled for **September 22, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

- **REMOTE HEARING INFORMATION:**

Due to the COVID-19 public health emergency, no in-person hearings are being held.

This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the "Zoom Request Form"), which is available on the Court's internet website at [www.vaeb.courts.gov](http://www.vaeb.courts.gov), on the page titled, "Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information." Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

\*\*\*The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge's attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

**\*\*\* PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: September 21, 2021

JAMEO DEWAYNE POLLOCK

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
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/s/ James E. Kane

James E. Kane

Afni  
Attn: Bankruptcy  
Po Box 3097  
Bloomington, IL 61702

Capital One  
Attn: General Correspondence/Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Capital One Auto Finance  
Attn: General Correspondence/Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Dept Of Ed/Navient  
Attn: Claims Dept  
P.O. Box 9635  
Wilkes Barr, PA 18773

Dept Of Ed/Navient  
Po Box 9635  
Wilkes Barre, PA 18773

Focused Recovery Solutions  
9701-Metropolitan Ct  
Ste B  
Richmond, VA 23236

Fst Premier  
601 S Minneapolis Ave  
Sioux Falls, SD 57104

Gerald Taylor  
8500 Perrymont Road  
Richmond, VA 23237

JL Walston & Associates  
Attn: Bankruptcy  
2609 N Duke St, Ste 501  
Durham, NC 27704

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Attn: Bankruptcy  
Po Box 9500  
Wilkes-Barr, PA 18773

Navient  
Po Box 9500  
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Receivables Performance Mgmt  
Attn: Bankruptcy  
Po Box 1548  
Lynnwood, WA 98036

Title Max  
4722 S. Laburnum Ave  
Henrico, VA 23231